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2003 JUN -5 P 2:07

June 3, 2003

FAA-03-14825-8

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 7th Street, SW,
Washington, DC 20590-0001

Subject: Docket No FAA-2003-14825 re: **Standard Airworthiness Certification of New Aircraft**,
68 Fed. Reg., Page 16217, April 3, 2002

Ladies and Gentlemen:

FAA has requested public comments on an advance proposal to amend the regulations for issuing a standard airworthiness certificate to certain new aircraft manufactured in the United States. In order to finalize a proposal for public comment, the FAA sought comments to a preliminary proposal, and suggestions on other methods to address the issues.

The proposal would address a concern that under the current regulations, certain new aircraft are eligible for a standard airworthiness certificate without meeting the requirements of a type certificate and without having been manufactured under an FAA production approval. The intended effect is to increase efficiency by ensuring that each new aircraft manufactured in the United States receives a standard airworthiness certificate only after the aircraft has been type certificated and manufactured under an FAA production approval.

Member airlines of the Air Transport Association provided the attached comments to the proposal. Comments include a specification recommendation to clarify the term "spare parts", to include harmonization with that term as used in certain existing regulations.

We appreciate the opportunity to contribute comments to this advance proposal for rulemaking, and thank you for your consideration of these views.

Sincerely,

Joe White
Director, Aircraft Systems Engineering

Docket No FAA-2003-14825

Pg. 2

June 2, 2003

Cc: Frank Paskiewicz, AIR-200, 202-267-5580
AEC

Encls/

JW/02-AE-042

00/00/00 10:02 FAX 202 020 4001 AIA 004

From: Barbara Taylor [via e-mail]
Sent: Thursday, May 08, 2003 4:07 PM
To: White, Joe
Cc: Barbara Taylor; Chuck Williams; Janice Tedford; Lester Wagner; Regulatory Affairs;
Rick Hardmeyer; Tonya Morgan
Subject: FAR Memo 2003-AE-042

May 8, 2003

ATTN: Joe White

REF: FAR Memo 2003-AE-042

Subject: New Aircraft; Standard Airworthiness Certification - Advance Proposed Rule

American Airlines has no objections or comments to the subject advanced proposed rule. The proposed rule only pertains to the issuance of Standard Airworthiness Certificates to new aircraft and will not affect American Airlines.

Regards,

M. H. Boes
Managing Director
Aircraft Engineering
American Airlines



Maintenance Operations

May 1, 2003

Air Transport Association of America
1301 Pennsylvania Ave., NW, Suite 1100
Washington, D.C. 20004-1707

Attention: Mr. Joe White
Director, Aircraft Systems Engineering

Subject: Standard Airworthiness Certification of New Aircraft
NPRM Docket No. FAA-2003-14825

Reference: ATA Memos 03-AE-042 & 03-AE-051

Dear Mr. White,

The reference ATA Memos advised of and requested comments on the subject proposed rule that will amend regulations for issuing a standard airworthiness certificate to certain new aircraft manufactured in the U.S. We concur with the contents of the proposed rule with the following exception. We are concerned that the definitions of spare and surplus parts include a requirement that the parts be produced under an appropriate FAA production approval (or under contract to the Armed Forces, in the case of surplus parts).

The terminology "spare parts" is specifically mentioned in 14 CFR 121.105, 121.123, 121.361, and 121 Appendix G. Strict application of the proposed definition appears to indicate that parts produced under 14 CFR 21.303(b)(2), 14 CFR 21.502, or 14 CFR 43.13(b) might not be considered to be spare parts—or necessitate that FAA production approval be obtained for such parts. It is also not clear whether standard parts, as defined in 14 CFR 21.303(b)(4) could be eligible to be spare parts.

We suggest that "or in accordance with 14 CFR 21.303, 14 CFR 21.502, or 14 CFR 43.13(b)" be added to the end of the spare and surplus part definitions.

San Francisco International Airport, San Francisco, California 94128

Page 2 - ATA Memos 03-AE-042 & 03-AE-051, Mr. White

Sincerely,

Original signed by

Larry Slate
Chief Engineer

cc: E. E. Curran, United Airlines—SFOEG
C. Puma, United Airlines—SFOEP
C. Satterlee, United Airlines—SFOEG

San Francisco International Airport, San Francisco, California 94128